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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

BLAISE CHIVERS-KING;)	
DYLAN TOLAR, by and through Debra Dever;)	
CHARLES “REES” KARN,)	
)	
Plaintiffs,)	
)	
v.)	Civil No. 24-cv-00039
)	
WYOMING DEPARTMENT OF FAMILY SERVICES,)	
WYOMING BOYS’ SCHOOL;)	
DALE WEBER, in his individual and official capacity;)	
ELSA OLSON, in her individual capacity;)	
AMANDA TURNER, in her individual capacity;)	
TATE ADAMS, in his individual capacity;)	
MIKE NELSON, in his individual capacity;)	
MARK NELSON, in his individual capacity;)	
THAD SCHAFFER, in his individual capacity;)	
JOHN SCHWABE, in his individual capacity;)	
KEVIN MCGENTY, in his individual capacity; and)	
MARGARET DAHLKE, in her individual capacity)	
)	
Defendants.)	

MOTION FOR ADMISSION OF COUNSEL TO APPEAR PRO HAC VICE

COMES NOW, Qusair Mohamedbhai, a duly licensed attorney in the State of Wyoming, member in good standing of the Bar in the State of Wyoming and the Bar of this Court, and hereby moves this honorable Court to allow the admission *pro hac vice* of attorney Matthew J. Cron of the law firm of RATHOD | MOHAMEDBHAI, 2701 Lawrence Street, Suite 100, Denver, Colorado 80205, telephone (303) 578-4400, who represents Plaintiffs in the above-captioned case.

Undersigned counsel vouches for the good moral character and veracity of Matthew J. Cron. In addition, counsel of record for Plaintiffs will be fully prepared to represent Plaintiffs at any time, in any capacity in this matter.

In compliance with U.S. District Court of Wyoming Local Rule 84.2(b), Applicant Matthew Cron has attached an Affidavit in support of this Motion hereto as Exhibit 1.

WHEREFORE, undersigned counsel respectfully requests that this Court admit Matthew J. Cron *pro hac vice* in this matter for the reasons set forth above and in the attached Affidavit.

DATED this 26th day of February, 2024.

Attorney for Plaintiffs:

/s/ Qusair Mohamedbhai
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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of February 2024, a true and correct copy of this **MOTION FOR ADMISSION OF COUNSEL TO APPEAR PRO HAC VIC** was filed using the CM/ECF System and served to all counsel of record.

Dylan Nelson
Dylan Nelson, Paralegal